

**IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION**

IN RE:

TERI GALARDI,

Debtor.

CHAPTER 11

Case No. 22-50035

**CONSENT MOTION TO EXTEND
TIME TO OBJECT TO DISCHARGEABILITY OF DEBT**

Jack Galardi, Jr. ("Mr. Galardi") and the JEG Trust—Jack Galardi Jr. Sub-Trust (the "SubTrust"), creditors in the above-captioned bankruptcy, hereby move the Court to extend the time period to object to the dischargeability of Mr. Galardi's and the SubTrust's claims against Debtor, pursuant to Federal Rules of Bankruptcy Procedure 4004(b) and 4007(c) (the "Bankruptcy Rules"). In support of this motion, Mr. Galardi and the SubTrust show the Court as follows:

1. On January 12, 2022, Teri Galardi ("Ms. Galardi" or "Debtor") filed a Voluntary Petition for relief under Chapter 11 of Title 11 of the United States Code (as amended, the "Bankruptcy Code").

2. By this motion, Mr. Galardi and the SubTrust request that the Court extend the time within which they may challenge the dischargeability of Ms. Galardi's debt under Bankruptcy Code § 523. Specifically, Mr. Galardi and the SubTrust request an extension of the deadline through and including April 25, 2022.

3. The current deadline for the filing of dischargeability objections is April 18, 2022, and Mr. Galardi and the SubTrust filed this motion before the time has

expired for the filing of such objections as required by Bankruptcy Rules 4004(b) and 4007(c). Debtor has consented to this request.

Wherefore, Mr. Galardi and the SubTrust pray that the Court grant the extension of time requested in this motion through **April 25, 2022**, and that the Court grant such other and further relief as may be just and proper.

Respectfully submitted this 18th day of April, 2022.

GEER LAW GROUP, LLC

/s/ Will Geer

Will Geer

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CERTIFICATE OF SERVICE

This is to certify that I have on this day electronically filed the foregoing *Consent Motion to Extend Time to Object to Dischargeability of Debt* ("Motion") using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of and an accompanying link to the Motion to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing Program:

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- **U.S. Trustee - MAC** Ustp.region21.mc.ecf@usdoj.gov

This 18th day April, 2022.

GEER LAW GROUP, LLC

/s/ Will Geer

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**[Proposed] CONSENT ORDER GRANTING CONSENT
MOTION TO EXTEND TIME TO OBJECT TO DISCHARGEABILITY OF DEBT**

On April 18, 2022, Jack Galardi, Jr. (“Mr. Galardi”) and the JEG Trust—Jack Galardi Jr. Sub-Trust (the “SubTrust”), creditors in the above-captioned bankruptcy, filed a *Consent Motion to Extend Time to Object to Dischargeability of Debt* [Docket No. ____], pursuant to Federal Rules of Bankruptcy Procedure 4004(b) and 4007(c) (the “Bankruptcy Rules”). Debtor has consented to the extension of time to April 25, 2022. The Motion was timely filed and shows cause for extending the deadline under Federal Rules of Bankruptcy Procedure 4004(b) for filing a complaint objecting to the dischargeability of debt under 11 U.S.C. § 523. Accordingly, it is hereby

ORDERED that the Motion is **GRANTED**. The deadline for Mr. Galardi and/or the SubTrust to file a complaint objecting to the dischargeability of their claims against Debtor under 11 U.S.C. § 523 is extended through and including April 25, 2022.

-END OF DOCUMENT-

Prepared and presented by:

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Consented to by:

/s/ Louis G. McBryan (w/ express permission)

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